

# Exhibit 6

## Bai, Benjamin

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发件人: Bai, Benjamin  
发送时间: 2024年7月25日星期四 8:17  
收件人: 'William Eskridge'; Zareefa Flener  
抄送: James Judge; Litigation  
主题: LOUIS POULSEN A/S Litigation, NDIL-1-23-cv-02807: Waves HK HOLDINGS LIMITED (Doe #425)  
附件: 8e3bcec23f286a397a4da78a8235cb3.jpg

William, thanks for providing the information. In keeping my words, I will accept service as a goodwill gesture; however, my accepting service does not mean that my clients concede jurisdiction of the U.S. courts, including NDIL. In fact, my clients explicitly reserve the right to contest the NDIL court's jurisdiction. I am accepting service so that we can have a discussion to resolve this case amicably.

Zareefa, let's discuss a resolution of this case. Due to the time difference, let me outline the relevant facts here.

1. The accused "infringing" product can be seen here: <https://thelightzey.com/products/black-bohemian-style-geometric-metal-candle-holder-hollow-candlestick-morocco-romantic-tealight-holder-party-wedding-decoration>. A copy is also attached to this email. **It is a candle holder, not a lighting product.**
2. Based on the complaint, it does not appear this candle holder concerns any of the IP rights of your clients. Specifically, it does not bear any of the trademarks, and the design is completely different. Therefore, there is no infringement whatsoever.
3. <https://thelightzey.com/> focuses on the UK market, not the U.S. Therefore, U.S. courts have no jurisdiction.

For these reasons, it appears to me there is no factual basis for the TRO. A corrective action is in order here. I am happy to jump on a call and discuss, if needed. Thanks.

### Benjamin Bai

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发件人: William Eskridge <[William@fleneriplaw.com](mailto:William@fleneriplaw.com)>

发送时间: 2024年7月24日 23:29

收件人: Bai, Benjamin <[benjamin.bai@cn.kwm.com](mailto:benjamin.bai@cn.kwm.com)>

抄送: James Judge <[jjudge@fleneriplaw.com](mailto:jjudge@fleneriplaw.com)>; Zareefa Flener <[zflener@fleneriplaw.com](mailto:zflener@fleneriplaw.com)>; Litigation

<Litigation@fleneriplaw.com>

主题: Re: LOUIS POULSEN A/S Litigation, NDIL-1-23-cv-02807: Waves HK HOLDINGS LIMITED (Doe #425)

Dear Counsel,

Attached you may find the following.

- 1: Evidence of Infringement.
- 2: Summons In A Civil Case.

The Summons and other court related documents can be accessed by the following link:

[https://www.dropbox.com/scl/fo/cfb4gw8okitxj9t47lg7c/AM\\_-Z9V8HDQN1fgk-rO5488?rlkey=b2isj6pagfbjx1lc4xvr06hsh&st=yge9kmkp&dl=0](https://www.dropbox.com/scl/fo/cfb4gw8okitxj9t47lg7c/AM_-Z9V8HDQN1fgk-rO5488?rlkey=b2isj6pagfbjx1lc4xvr06hsh&st=yge9kmkp&dl=0)

Settlement Negotiations are being handled by Zareefa Flener (copied here.)

Kind regards,

William Eskridge  
Paralegal  
FLIP Litigation Team  
Flener IP & Business Law



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Chicago, Illinois 60602, U.S.A.  
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**From:** Bai, Benjamin <[benjamin.bai@cn.kwm.com](mailto:benjamin.bai@cn.kwm.com)>  
**Date:** Wednesday, July 24, 2024 at 4:52 AM  
**To:** William Eskridge <[William@fleneriplaw.com](mailto:William@fleneriplaw.com)>  
**Cc:** James Judge <[jjudge@fleneriplaw.com](mailto:jjudge@fleneriplaw.com)>, Zareefa Flener <[zflener@fleneriplaw.com](mailto:zflener@fleneriplaw.com)>, Litigation <[Litigation@fleneriplaw.com](mailto:Litigation@fleneriplaw.com)>

**Subject:** LOUIS POULSEN A/S Litigation, NDIL-1-23-cv-02807: Waves HK HOLDINGS LIMITED (Doe #425)

Hi William,

Thanks for providing the complaint and TRO. I am prepared to accept service on behalf of the clients if you provide evidence of infringement. The attached documents do not appear to include any evidence of infringement. I look forward to hearing from you.

Benjamin

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发件人: William Eskridge <[William@fleneriplaw.com](mailto:William@fleneriplaw.com)>

发送时间: 2024年7月24日 4:38

收件人: Bai, Benjamin <[benjamin.bai@cn.kwm.com](mailto:benjamin.bai@cn.kwm.com)>

抄送: James Judge <[jjudge@fleneriplaw.com](mailto:jjudge@fleneriplaw.com)>; Zareefa Flener <[zflener@fleneriplaw.com](mailto:zflener@fleneriplaw.com)>; Litigation <[Litigation@fleneriplaw.com](mailto:Litigation@fleneriplaw.com)>

主题: Re: LOUIS POULSEN A/S Litigation, NDIL-1-23-cv-02807: Waves HK HOLDINGS LIMITED (Doe #425)

Dear Counsel,

With the information provide we were able to identify the merchant listed below in case 24-cv-04260.

Doe #: 425

Name: thelightzey

Merchant ID: thelightzey

Backend ID:

Email: [contact@waveschange.us](mailto:contact@waveschange.us) [contact@grandvoyage.xyz](mailto:contact@grandvoyage.xyz)

Would you be willing to Accept or Waive service on behalf of your client? A copy of the TRO and Complaint in 24-cv-04260 has been attached.

Kind regards,

William Eskridge

Paralegal

FLIP Litigation Team

Flener IP & Business Law



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**From:** Bai, Benjamin <[benjamin.bai@cn.kwm.com](mailto:benjamin.bai@cn.kwm.com)>

**Date:** Tuesday, July 23, 2024 at 2:01 AM

**To:** William Eskridge <[William@fleneriplaw.com](mailto:William@fleneriplaw.com)>

**Cc:** James Judge <[jjudge@fleneriplaw.com](mailto:jjudge@fleneriplaw.com)>, Zareefa Flener <[zflener@fleneriplaw.com](mailto:zflener@fleneriplaw.com)>

**Subject:** 答复: LOUIS POULSEN A/S Litigation, NDIL-1-23-cv-02807: Waves HK HOLDINGS LIMITED

William,

Here is the requested information:

Platform: lassola.com

Merchant ID: JSKK2D7UW6YHN

Associated email: [contact@waveschange.us](mailto:contact@waveschange.us)

I hope this is enough information for you to identify the TRO. Our client's PayPal account is frozen. There must be a TRO. I'd appreciate a copy. Thanks.

**Benjamin Bai**

国际合伙人 | International Partner

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E [benjamin.bai@cn.kwm.com](mailto:benjamin.bai@cn.kwm.com)

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**发件人:** William Eskridge <[William@fleneriplaw.com](mailto:William@fleneriplaw.com)>

**发送时间:** 2024年7月23日 4:05

**收件人:** Bai, Benjamin <[benjamin.bai@cn.kwm.com](mailto:benjamin.bai@cn.kwm.com)>

**抄送:** James Judge <[jjudge@fleneriplaw.com](mailto:jjudge@fleneriplaw.com)>; Zareefa Flener <[zflener@fleneriplaw.com](mailto:zflener@fleneriplaw.com)>

**主题:** Re: LOUIS POULSEN A/S Litigation, NDIL-1-23-cv-02807: Waves HK HOLDINGS LIMITED

Dear Counsel,

We are not able to locate the store with the information provided. Kindly provide the platform, email address and associated Merchant ID.

Kind regards,  
William Eskridge  
Paralegal  
FLIP Litigation Team

---

**From:** Bai, Benjamin <[benjamin.bai@cn.kwm.com](mailto:benjamin.bai@cn.kwm.com)>  
**Date:** Monday, July 22, 2024 at 01:33  
**To:** James Judge <[jjudge@fleneriplaw.com](mailto:jjudge@fleneriplaw.com)>  
**Subject:** LOUIS POULSEN A/S Litigation, NDIL-1-23-cv-02807: Waves HK HOLDINGS LIMITED

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Re.: LOUIS POULSEN A/S Litigation, NDIL-1-23-cv-02807

Dear Mr. Judge,

I am a Texas-licensed IP litigator practicing in China. On behalf of my clients, I write as counsel for the following companies with respect to the lawsuit identified in the above:

**Waves HK Holdings Limited**

Shanghai LiuYang Information Technology Co., Ltd. (上海扬柳信息技术有限公司)

Our client's Paypal account is frozen, presumably due to the TRO you obtained from the court. Could you please email me a copy of the TRO referencing my clients? I cannot find anything about my clients in the attached documents.

I was the Chief IP Counsel and Chief Litigation Counsel for Alipay 2016-2022 and dealt with numerous issues like this. I believe we can find a way to resolve the dispute and look forward to hearing from you. Thanks.

**Benjamin Bai**

国际合伙人 | International Partner

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